

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEJA RAVI,)	
)	
Plaintiff,)	
)	No. 20-1237C
v.)	(Senior Judge Firestone)
)	
)	
THE UNITED STATES,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR ENLARGEMENT OF
TIME TO FILE A REPLY BRIEF IN SUPPORT OF OUR MOTION TO DISMISS**

Pursuant to Rule 6.1 of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests an enlargement of time of five days to file a reply brief in support of our motion to dismiss. Our reply brief is currently due on or before February 19, 2021. If this motion is granted, our reply brief will be due on or before February 24, 2021. This is our first request for an enlargement of time for this purpose. Counsel for plaintiff states that she does not oppose this motion.

Good cause supports our request. Plaintiff filed his response to our motion to dismiss on February 5, 2021. ECF No. 9. Since then, Government counsel has had to devote his time to a number of competing obligations that have affected his ability to finalize the Government's reply brief in this case. These include: (1) preparing a reply brief in support of an opposed motion for voluntary remand in a Military Pay Act case, *Delroy Miller v. United States*, No. 20-1320C (Fed. Cl.), which we filed on February 12, 2021; (2) preparing a response to a motion for summary judgment in a contract case, *David Boland, Inc. v. United States*, No. 17-166C (Fed. Cl.), which we filed yesterday, on February 16, 2021; and (3) finalizing an administrative record in an appeal before the United States Court of Appeals for the Federal Circuit, entitled *Military*

Veterans Advocacy, Inc. v. Secretary of Veterans Affairs, No. 20-2086 (Fed. Cir.), which is due on or before February 19, 2021, the same day our reply brief in this case is currently due.

Although undersigned counsel has endeavored to complete the Government's reply brief in this matter without seeking an enlargement, it is now clear that more time is necessary.

For these reasons, we respectfully request that the Court grant our unopposed motion for an enlargement of time of five days, through and including February 24, 2021, within which to file a reply brief in support of our motion to dismiss.

Respectfully submitted,

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February 17, 2021

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 17th day of February 2021, a copy of the foregoing “UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME TO FILE A REPLY BRIEF IN SUPPORT OF OUR MOTION TO DISMISS” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

s/ Meen Geu Oh